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Attorneys for Caspian Capital Advisors,
LLC; Castlerigg Master Investments Ltd.;
Davidson Kempner Capital Management
LLC; Elliott Associates, L.P.; Nomura
Corporate Research & Asset Management,
Inc.; Sailfish Capital Partners, LLC; SPCP
Group, LLC; and Whitebox Advisors, LLC

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	:
	:
	: Chapter 11
	:
DELPHI CORPORATION, <u>et al.</u> ,	:
	: Case No. 05-44481 (RDD)
	:
Debtors.	: (Jointly Administered)
	:
-----X	

**MOTION FOR ADMISSION OF
JOHN MOUSTAKAS *PRO HAC VICE***

John Moustakas ("Applicant") does hereby move this Court to enter an order admitting him *pro hac vice* to participate in these cases and any and all proceedings in connection with these cases as counsel for Caspian Capital Advisors, LLC; Castlerigg Master

Investments Ltd.; Davidson Kempner Capital Management LLC; Elliott Associates, L.P.; Nomura Corporate Research & Asset Management, Inc.; Sailfish Capital Partners, LLC; SPCP Group, LLC; and Whitebox Advisors, LLC or any affiliates thereof (each a “Creditor”), parties in interest in the above-captioned cases. In support of this motion, Applicant states the following:

1. My name is John Moustakas, and I am partner in the law firm of Goodwin Procter LLP, 901 New York Avenue, N.W., Washington, D.C. 20001. My office telephone number is 202-346-4236, my office facsimile number is 202-346-4444, and my email address is jmoustakas@goodwinprocter.com.

2. I have been a member in good standing of the District of Columbia Bar since June 3, 1994. In addition, I have been a member in good standing of the Massachusetts Bar since June 18, 1992.

3. I am admitted to practice in good standing in the U.S. Courts of Appeals for the Fifth and D.C. Circuits; and the U.S. District Court for the District of Columbia.

4. I agree to pay the \$25.00 fee upon approval by the Court admitting me to practice *pro hac vice* as counsel for the Creditors to participate in these cases and any and all proceedings in connection therewith.

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Dated: November 21, 2007

Respectfully submitted,

By: /s/ John Moustakas
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